

1 SIGAL CHATTAH, NVSBN 5634

2 Acting United States Attorney

3 District of Nevada

4 DAVID PRIDDY, ILSBN 6313767

5 Special Assistant United States Attorney

6 Social Security Administration

7 Office of Law & Policy

8 Program Litigation 1

9 6401 Security Boulevard

10 Baltimore, MD 21235

11 Telephone: (510) 970-4801

12 Facsimile: (415) 744-0134

13 E-Mail: David.Priddy@ssa.gov

14 Attorneys for Defendant

15 **UNITED STATES DISTRICT COURT**

16 **DISTRICT OF NEVADA**

17 STEPHANIE VICTORIA GARCIA,

18 Plaintiff,

19 v.
20 FRANK BISIGNANO,
21 Commissioner of Social Security,

22 Defendant.

23) Case No.: 2:25-cv-00870-EJY

24)
25) **UNOPPOSED MOTION FOR**
26) **EXTENSION OF TIME**
27) **(FIRST REQUEST)**

28
29 Defendant, Frank Bisignano, Commissioner of Social Security (Defendant), respectfully
30 requests that the Court extend the time for Defendant to respond to Plaintiff's Brief (Dkt. No. 10, filed
31 on August 20, 2025), currently due on September 19, 2025, by 35 days, through and including October
32 24, 2025. Defendant further requests that the deadline for Plaintiff's optional reply brief be extended
33 to November 7, 2025.

34 This is Defendant's first request for an extension of time to file a response. Good cause exists
35 for this extension. Defendant's counsel must take unplanned medical leave, which prevents

1 Defendant's counsel from being able to work on this response. Counsel is also responsible for writing
2 briefs defending the Commissioner in multiple other district court cases with concurrent due dates.

3 Additional time is required to review the record, to evaluate the issues raised in Plaintiff's
4 brief, to determine whether options exist for settlement, and if not, to prepare Defendant's response to
5 Plaintiff's brief. Defendant's counsel will endeavor to complete these tasks as soon as possible. This
6 request is made in good faith and with no intention to unduly delay the proceedings, and counsel
7 apologizes for any inconvenience.

8 Counsel for Defendant advised counsel for Plaintiff of the need for this extension on
9 September 18, 2025. Counsel for Plaintiff confirmed that Plaintiff does not object to this request.

10 It is therefore requested that Defendant be granted an extension of time to respond to Plaintiff's
11 Brief, through and including October 24, 2025.

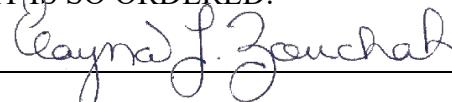
12
13 Dated: September 18, 2025

Respectfully submitted,

14 SIGAL CHATTAH
15 Acting United States Attorney

16 */s/ David Priddy*
17 DAVID PRIDDY
18 Special Assistant United States Attorney

19
20 IT IS SO ORDERED:
21



22

Dated September 18, 2025